

## REMARKS

Reconsideration and allowance are respectfully requested in view of the following remarks.

By this amendment, claims 1, 11, 17, 28 and 38 are amended. No new matter has been added. Accordingly, claims 1-7, 9-11, 13-23, 25-28, 30-33, 35-38 and 48-58 are pending in the present application.

### **Claim Rejections Under 35 U.S.C. § 103**

Claims 1-7, 9-11, 13-23, 25-28, 30-33, 35-38, 48, 52, 54, 56 and 58 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Bellagarda et al. (article entitled "Exploiting Latent Semantic Information in Statistical Language Modeling", hereinafter "Bellagarda") in view of Vivisimo (article entitled "Vivisimo FAQ", hereinafter "Vivisimo").

For clarification, claim 1 is amended to recite a method of displaying files within a file system to a user in a semantic hierarchy, the method comprising the steps of:

- mapping the files in the file system into a semantic vector space;
- clustering the files within said space, wherein multiple threshold values that are settable to desired levels of granularity are defined, and said files are clustered based on said multiple threshold values;
- deriving a hierarchy of plural levels of clusters from said clustering; and
- providing a user an option of displaying the files in a hierarchical format of plural levels of clusters based on said derived hierarchy, or displaying the files in a hierarchical format based on locations of the files in the file system.

According to Applicant's exemplary embodiments, a semantic view of files in a file system is incorporated into a graphical user interface displaying the files to a

user as one of a number of selectable options from which the user can choose. See the published specification, Publication No. 2005/0044487: paragraph 0047. Thus, a default view might be the hierarchical tree view of FIG. 2A, in which the files are organized in accordance with their path names, i.e. the actual file system structure.

*Id.* To facilitate access to a particular file whose location may not be intuitive, the user can switch to the semantic view of FIG. 2B, and thereby select it on the basis of its content, rather than its location. *Id.*

Bellagarda and Vivisimo, whether considered individually or in combination, do not disclose a method of displaying files within a file system that includes mapping the files in the file system into a semantic vector space, deriving a hierarchy based on clustering within the vector space, and providing a user an option of displaying the files in a hierarchical format of plural levels of clusters based on said derived hierarchy, or displaying the files in a hierarchical format based on locations of the files in the file system.

Bellagarda discloses exploring semantic information in statistical language modelling by mapping words in files onto a continuous semantic vector space, in which clustering techniques are applied.

Vivisimo discloses organizing search results produced by a search engine in a hierarchy by using document clustering.

Neither Bellagarda nor Vivisimo discloses mapping the files in the file system into a semantic vector space. Furthermore, neither Bellagarda nor Vivisimo discloses displaying the files organized based on the semantic information as an alternative to displaying the files organized by the locations of the files in the file system. As such, Bellagarda and Vivisimo, whether considered individually or in

combination, do not disclose a method of displaying files within a file system that includes mapping the files in the file system into a semantic vector space, deriving a hierarchy based on clustering within the vector space, and providing a user an option of displaying the files in a hierarchical format of plural levels of clusters based on said derived hierarchy, or displaying the files in a hierarchical format based on locations of the files in the file system, as described in claim 1.

In view of the foregoing, claim 1 is patentable. Claims 2-7, 9, 10, 48 and 58 are patentable at least because of their dependency. Claims 11, 13-23, 25-28, 30-33, 35-38, 52, 54 and 56 are patentable at least because they include distinguishing features similar to those of claim 1.

Claims 49, 51, 53, 55 and 57 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Bellagarda, in view of Vivisimo, and further in view of Hertz (U.S. PGPUB 2003/0037041, hereinafter "Hertz").

Hertz discloses clustering documents into a hierarchical cluster. Hertz, however, is silent on providing a user an option of displaying the files in a hierarchical format of plural levels of clusters based on said derived hierarchy, or displaying the files in a hierarchical format based on locations of the files in the file system, as described in claim 1. Therefore, Hertz fails to remedy the deficiencies of the Bellagarda and the Vivisimo references. Accordingly, the remaining claims are patentable.

**CONCLUSION**

From the foregoing, further and favorable action in the form of a Notice of Allowance is respectfully requested and such action is earnestly solicited.

In the event that there are any questions concerning this amendment, or the application in general, the Examiner is respectfully requested to telephone the undersigned so that prosecution of present application may be expedited.

Respectfully submitted,

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